

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:) Chapter 11
EBRO REAL ESTATE HOLDINGS, LLC)
Debtor.) The Honorable Eugene R. Wedoff
Case No. 09-10104

**BANK OF AMERICA'S LIMITED OBJECTION
TO ADMISSION OF DEBTOR'S EXHIBIT #1**

Bank of America (the "Bank") files this limited objection to admission of Exhibit #1 on EBRO Real Estate Holdings, LLC's (the "Debtor") Exhibit List (Docket No. 81) pursuant to that certain Trial Order dated as of September 18, 2009 (Docket No. 72). The Bank objects to the admission of Exhibit #1 to the extent that the Debtor fails to lay foundation as to Exhibit #1 at the related hearing.

Dated: September 23, 2009

Respectfully submitted,

BANK OF AMERICA

By: /s/ Morgan M. Smith
ROBERT D. NACHMAN (#6185804)
MORGAN M. SMITH (# 6287435)
DYKEMA GOSSETT PLLC
10 S. Wacker Dr., Suite 2300
Chicago, Illinois 60606
Telephone: (312) 876-1700
Facsimile: (312) 876-1155
rnachman@dykema.com
mmsmith@dykema.com

CERTIFICATE OF SERVICE

Morgan M. Smith, an attorney, hereby certifies that on September 23, 2009, he caused a true and correct copy of BANK OF AMERICA'S LIMITED OBJECTION TO ADMISSION OF DEBTOR'S EXHIBIT #1, to be served on (i) the parties on the attached Service List by electronic mail, and (ii) all parties that have appeared electronically in the above-captioned bankruptcy case via the Court's CM/ECF system. Parties may access the within instrument through the Court's CM/ECF system.

Dated: September 23, 2009

By: /s/ Morgan M. Smith
MORGAN M. SMITH (# 6287435)
DYKEMA GOSSETT PLLC
10 S. Wacker Dr., Suite 2300
Chicago, Illinois 60606
Telephone: (312) 876-1700
Facsimile: (312) 876-1155
mmsmith@dykema.com

SERVICE LIST

<p>Forrest L Ingram Forrest L. Ingram, P.C. 79 W Monroe Street, Suite 900 Chicago, IL 60603 Fax : 312 759-0298 Email: fingram@fingramlaw.com <i>Counsel for the Debtor</i></p>	<p>Peter L Berk Law Office of Peter L. Berk 79 West Monroe, Suite 900 Chicago, IL 60603 Fax : (312) 759-0298 Email: plberk@berklegal.com <i>Counsel for the Debtor</i></p>
<p><i>Office of the U.S. Trustee</i> Attn: Kathryn M. Gleason Office of the U.S. Trustee 219 S Dearborn St., Room 873 Chicago, IL 60604 kathryn.m.gleason@usdoj.gov</p>	